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UNITED STATES OF AMERICA
14

15 UNITED STATES DISTRICT COURT

16 FOR THE CENTRAL DISTRICT OF CALIFORNIA

17 UNITED STATES OF AMERICA,

18 Plaintiff,

19 v.

20 YICHENG ZHANG,
aka "Eason,"

21 Defendant.
22
23

No. 2:24-CR-00311-RGK-2

PLEA AGREEMENT FOR DEFENDANT
YICHENG ZHANG

24 1. This constitutes the plea agreement between YICHENG ZHANG,
25 aka "Eason," ("defendant") and the United States Attorney's Office
26 for the Central District of California (the "USAO") and the United
27 States Department of Justice, Computer Crime and Intellectual
28 Property Section ("CCIPS" and together with the USAO, the "United

1 States") in the above-captioned case. This agreement is limited to
2 the USAO and CCIPS and cannot bind any other federal, state, local,
3 or foreign prosecuting, enforcement, administrative, or regulatory
4 authorities.

5 DEFENDANT'S OBLIGATIONS

6 2. Defendant agrees to:

7 a. At the earliest opportunity requested by the United
8 States and provided by the Court, appear and plead guilty to Count
9 One of the indictment in United States v. Daren Li, et al., CR No.
10 2:24-311-RGK-2, which charges defendant with conspiracy to commit
11 money laundering, in violation of 18 U.S.C. § 1956(h).

12 b. Not contest facts agreed to in this agreement.

13 c. Abide by all agreements regarding sentencing contained
14 in this agreement.

15 d. Appear for all court appearances, surrender as ordered
16 for service of sentence, obey all conditions of any bond, and obey
17 any other ongoing court order in this matter.

18 e. Not commit any crime; however, offenses that would be
19 excluded for sentencing purposes under United States Sentencing
20 Guidelines ("U.S.S.G." or "Sentencing Guidelines") § 4A1.2(c) are not
21 within the scope of this agreement.

22 f. Be truthful at all times with the United States
23 Probation and Pretrial Services Office and the Court.

24 g. Pay the applicable special assessment at or before the
25 time of sentencing unless defendant has demonstrated a lack of
26 ability to pay such assessments.

27 h. Defendant agrees that any and all criminal debt
28 ordered by the Court will be due in full and immediately. The

1 government is not precluded from pursuing, in excess of any payment
2 schedule set by the Court, any and all available remedies by which to
3 satisfy defendant's payment of the full financial obligation,
4 including referral to the Treasury Offset Program.

5 i. Complete the Financial Disclosure Statement on a form
6 provided by the USAO and, within 30 days of defendant's entry of a
7 guilty plea, deliver the signed and dated statement, along with all
8 of the documents requested therein, to the USAO by either email at
9 usacac.FinLit@usdoj.gov (preferred) or mail to the USAO Financial
10 Litigation Section at 300 North Los Angeles Street, Suite 7516, Los
11 Angeles, CA 90012. Defendant agrees that defendant's ability to pay
12 criminal debt shall be assessed based on the completed Financial
13 Disclosure Statement and all required supporting documents, as well
14 as other relevant information relating to ability to pay.

15 j. Authorize the USAO to obtain a credit report upon
16 returning a signed copy of this plea agreement.

17 k. Consent to the USAO inspecting and copying all of
18 defendant's financial documents and financial information held by the
19 United States Probation and Pretrial Services Office.

20 THE UNITED STATES' OBLIGATIONS

21 3. The United States agrees to:

22 a. Not contest facts agreed to in this agreement.

23 b. Abide by all agreements regarding sentencing contained
24 in this agreement.

25 c. At the time of sentencing, move to dismiss the
26 remaining counts of the indictment as against defendant. Defendant
27 agrees, however, that at the time of sentencing the Court may
28 consider any dismissed charges in determining the applicable

1 Sentencing Guidelines range, the propriety and extent of any
2 departure from that range, and the sentence to be imposed.

3 d. At the time of sentencing, provided that defendant
4 demonstrates an acceptance of responsibility for the offense up to
5 and including the time of sentencing, recommend a two-level reduction
6 in the applicable Sentencing Guidelines offense level, pursuant to
7 U.S.S.G. § 3E1.1, and recommend and, if necessary, move for an
8 additional one-level reduction if available under that section.

9 NATURE OF THE OFFENSE

10 4. Defendant understands that for defendant to be guilty of
11 the crime charged in count one, that is, conspiracy to commit money
12 laundering, in violation of Title 18, United States Code, Section
13 1956(h), the following must be true: first, there was an agreement
14 between two or more persons to engage in concealment money
15 laundering, in violation of Title 18, United States Code, Section
16 1956(a)(1)(B)(i); and second, defendant became a member of the
17 conspiracy knowing of its object and intending to help accomplish it.
18 The elements of concealment money laundering, are as follows: first,
19 defendant conducted or intended to conduct a financial transaction
20 involving property that represented the proceeds of wire fraud, in
21 violation of Title 18, United States Code, Section 1343; second,
22 defendant knew that the property represented the proceeds of some
23 form of unlawful activity; and third, defendant knew that the
24 transaction was designed in whole or in part to conceal or disguise
25 the nature, location, source, ownership, and control of the proceeds.

26 PENALTIES AND RESTITUTION

27 5. Defendant understands that the statutory maximum sentence
28 that the Court can impose for a violation of Title 18, United States

1 Code, Section 1956(h), is: 20 years' imprisonment; a three-year
2 period of supervised release; a fine of \$500,000 or twice the value
3 of the property involved in the transaction, whichever is greatest;
4 and a mandatory special assessment of \$100.

5 6. Defendant understands that defendant will be required to
6 pay full restitution to the victims of the offense to which defendant
7 is pleading guilty. Defendant agrees that, in return for the United
8 States' compliance with its obligations under this agreement, the
9 Court may order restitution to persons other than the victims of the
10 offense to which defendant is pleading guilty and in amounts greater
11 than those alleged in the count to which defendant is pleading
12 guilty. In particular, defendant agrees that the Court may order
13 restitution to any victim of any of the following for any losses
14 suffered by that victim as a result: any relevant conduct, as defined
15 in U.S.S.G. § 1B1.3, in connection with the offense to which
16 defendant is pleading guilty. The applicable amount of restitution
17 is between at least \$90,310 and \$2,376,070. The parties agree that
18 the amount of restitution could change based on facts that come to
19 the attention of the parties prior to sentencing.

20 7. Defendant understands that supervised release is a period
21 of time following imprisonment during which defendant will be subject
22 to various restrictions and requirements. Defendant understands that
23 if defendant violates one or more of the conditions of any supervised
24 release imposed, defendant may be returned to prison for all or part
25 of the term of supervised release authorized by statute for the
26 offense that resulted in the term of supervised release, which could
27 result in defendant serving a total term of imprisonment greater than
28 the statutory maximum stated above.

1 8. Defendant understands that, by pleading guilty, defendant
2 may be giving up valuable government benefits and valuable civic
3 rights, such as the right to vote, the right to possess a firearm,
4 the right to hold office, and the right to serve on a jury.
5 Defendant understands that he is pleading guilty to a felony and that
6 it is a federal crime for a convicted felon to possess a firearm or
7 ammunition. Defendant understands that the conviction in this case
8 may also subject defendant to various other collateral consequences,
9 including but not limited to revocation of probation, parole, or
10 supervised release in another case and suspension or revocation of a
11 professional license. Defendant understands that unanticipated
12 collateral consequences will not serve as grounds to withdraw
13 defendant's guilty plea.

14 9. Defendant and his counsel have discussed the fact that, and
15 defendant understands that, if defendant is not a United States
16 citizen, the conviction in this case makes it practically inevitable
17 and a virtual certainty that defendant will be removed or deported
18 from the United States. Defendant may also be denied United States
19 citizenship and admission to the United States in the future.
20 Defendant understands that while there may be arguments that
21 defendant can raise in immigration proceedings to avoid or delay
22 removal, removal is presumptively mandatory and a virtual certainty
23 in this case. Defendant further understands that removal and
24 immigration consequences are the subject of a separate proceeding and
25 that no one, including his attorney or the Court, can predict to an
26 absolute certainty the effect of his conviction on his immigration
27 status. Defendant nevertheless affirms that he wants to plead guilty
28

1 regardless of any immigration consequences that his plea may entail,
2 even if the consequence is automatic removal from the United States.

3 FACTUAL BASIS

4 10. Defendant admits that defendant is, in fact, guilty of the
5 offense to which defendant is agreeing to plead guilty. Defendant
6 and the United States agree to the statement of facts provided below
7 and agree that this statement of facts is sufficient to support a
8 plea of guilty to the charge described in this agreement and to
9 establish the Sentencing Guidelines factors set forth in paragraph 12
10 below but is not meant to be a complete recitation of all facts
11 relevant to the underlying criminal conduct or all facts known to
12 either party that relate to that conduct.

13 Beginning from at least August 2021, and continuing through at
14 least April 12, 2024, in Los Angeles County, within the Central
15 District of California, and elsewhere, defendant knowingly conspired
16 with co-defendant DAREN LI, and others, to conduct financial
17 transactions involving property that represented the proceeds of wire
18 fraud, in violation of Title 18, United States Code, Section 1343.
19 Defendant became a member of the conspiracy knowing of at least one
20 of its objects and intending to help accomplish it.

21 Defendant admits that he conspired with LI and others to launder
22 funds obtained from victims through cryptocurrency scams and related
23 frauds, as described in count one of the indictment, and admits that
24 the factual allegations described in count one are true and accurate.
25 Defendant knew that the property involved in the financial
26 transactions represented, and would represent, the proceeds of some
27 form of unlawful activity and that the transactions were, and would
28 be, designed in whole or in part to conceal or disguise the nature,

1 location, source, ownership, and control of the proceeds. The
2 overall laundering scheme involved at least \$73.6 million in
3 fraudulently obtained funds.

4 In furtherance of the conspiracy, defendant communicated with
5 his co-conspirators through encrypted messaging services. In order
6 to conceal or disguise the nature, location, source, ownership, and
7 control of the fraudulently obtained victim funds, defendant would
8 instruct co-conspirators how to open bank accounts established on
9 behalf of shell companies, including for shell companies in the name
10 of SMX Beauty, Inc. and SMX Travel, Inc., so that other co-
11 conspirators could direct the transfer of victim funds to those bank
12 accounts. Defendant's co-conspirators would then direct victims to
13 transfer funds to various domestic bank accounts, including SMX
14 Beauty, Inc. and SMX Travel, Inc., and then transmit those victim
15 funds through various domestic and international intermediary bank
16 accounts before reaching their final beneficiary. Defendant's co-
17 conspirators would monitor the conversion of victim funds to virtual
18 currency, specifically Tether ("USDT") and ultimately receive the
19 victim funds in financial accounts controlled by defendant's co-
20 conspirators.

21 At the direction of other co-conspirators, defendant also opened
22 and operated two of the domestic intermediary bank accounts used to
23 launder victim funds. Specifically, defendant received at least
24 \$90,310 in victim funds to his Bank of America checking account
25 ending in 5585 and his Bank of America savings account ending in
26 0782. At the direction of other co-conspirators, defendant then
27 transferred those victim funds from his bank accounts to other
28 domestic and international bank accounts.

Defendant admits that at least \$90,310 in victim funds were directly deposited into bank accounts that defendant opened and controlled. Defendant also admits that at least \$2,285,760 was transferred from domestic bank accounts in the names of SMX Travel, Inc. and SMX Beauty, Inc. to two bank accounts held at Deltec Bank & Trust in the Bahamas.

SENTENCING FACTORS

11. Defendant understands that in determining defendant's sentence the Court is required to calculate the applicable Sentencing Guidelines range and to consider that range, possible departures under the Sentencing Guidelines, and the other sentencing factors set forth in 18 U.S.C. § 3553(a). Defendant understands that the Sentencing Guidelines are advisory only, that defendant cannot have any expectation of receiving a sentence within the calculated Sentencing Guidelines range, and that after considering the Sentencing Guidelines and the other § 3553(a) factors, the Court will be free to exercise its discretion to impose any sentence it finds appropriate up to the maximum set by statute for the crime of conviction.

12. Defendant and the United States agree to the following applicable Sentencing Guidelines factors:

Base Offense Level:	8	U.S.S.G. § 2S1.1(a) (2)
		U.S.S.G. § 2X1.1(a)
Laundered Funds Between More Than \$40,000 And More Than \$1,500,000	+6 to +16	U.S.S.G. § 2B1.1(b) (1) (D)
		U.S.S.G. § 2B1.1(b) (1) (I)
Conviction Under § 1956	+2	U.S.S.G. § 2S1.1(b) (2) (B)
Minor Role	-2	U.S.S.G. § 3B1.2 (b)

1 Defendant and the United States reserve the right to argue that
2 additional specific offense characteristics, adjustments, and
3 departures under the Sentencing Guidelines are appropriate.
4 Specifically, defendant reserves the right to argue that defendant
5 should receive a 2-level reduction under U.S.S.G. § 4C1.1, and the
6 government reserves the right to oppose application of U.S.S.G.
7 § 4C1.1. The government also reserves the right to argue that
8 defendant should receive up to a 16-level enhancement for laundered
9 funds exceeding \$1,500,000, under U.S.S.G. § 2B1.1(b)(1)(I), and
10 defendant reserves the right to argue that defendant should receive
11 no more than a 6-level enhancement for laundered funds exceeding
12 \$40,000, under U.S.S.G. § 2B1.1(b)(1)(D).

13 13. Defendant understands that there is no agreement as to
14 defendant's criminal history or criminal history category.

15 14. Defendant and the United States reserve the right to argue
16 for a sentence outside the sentencing range established by the
17 Sentencing Guidelines based on the factors set forth in 18 U.S.C.
18 § 3553(a)(1), (a)(2), (a)(3), (a)(6), and (a)(7).

19 WAIVER OF CONSTITUTIONAL RIGHTS

20 15. Defendant understands that by pleading guilty, defendant
21 gives up the following rights:

- 22 a. The right to persist in a plea of not guilty.
- 23 b. The right to a speedy and public trial by jury.
- 24 c. The right to be represented by counsel -- and if
25 necessary have the Court appoint counsel -- at trial. Defendant
26 understands, however, that, defendant retains the right to be
27 represented by counsel -- and if necessary have the Court appoint
28 counsel -- at every other stage of the proceeding.

1 d. The right to be presumed innocent and to have the
2 burden of proof placed on the government to prove defendant guilty
3 beyond a reasonable doubt.

4 e. The right to confront and cross-examine witnesses
5 against defendant.

6 f. The right to testify and to present evidence in
7 opposition to the charges, including the right to compel the
8 attendance of witnesses to testify.

9 g. The right not to be compelled to testify, and, if
10 defendant chose not to testify or present evidence, to have that
11 choice not be used against defendant.

12 h. Any and all rights to pursue any affirmative defenses,
13 Fourth Amendment or Fifth Amendment claims, and other pretrial
14 motions that have been filed or could be filed.

15 WAIVER OF RETURN OF DIGITAL DATA

16 16. Understanding that the government has in its possession
17 digital devices and/or digital media seized from defendant, defendant
18 waives any right to the return of digital data contained on those
19 digital devices and/or digital media and agrees that if any of these
20 digital devices and/or digital media are returned to defendant, the
21 government may delete all digital data from those digital devices
22 and/or digital media before they are returned to defendant.

23 WAIVER OF APPEAL OF CONVICTION

24 17. Defendant understands that, with the exception of an appeal
25 based on a claim that defendant's guilty plea was involuntary, by
26 pleading guilty defendant is waiving and giving up any right to
27 appeal defendant's conviction on the offense to which defendant is
28 pleading guilty. Defendant understands that this waiver includes,

1 but is not limited to, arguments that the statute to which defendant
2 is pleading guilty is unconstitutional, and any and all claims that
3 the statement of facts provided herein is insufficient to support
4 defendant's plea of guilty.

5 WAIVER OF APPEAL OF SENTENCE AND COLLATERAL ATTACK

6 18. Defendant agrees that, provided the Court imposes a total
7 term of imprisonment on all counts of conviction within or below the
8 range corresponding with an offense level of 19 and the criminal
9 history category calculated by the Court, defendant gives up the
10 right to appeal all of the following: (a) the procedures and
11 calculations used to determine and impose any portion of the
12 sentence; (b) the term of imprisonment imposed by the Court; (c) the
13 fine imposed by the Court, provided it is within the statutory
14 maximum; (d) to the extent permitted by law, the constitutionality or
15 legality of defendant's sentence, provided it is within the statutory
16 maximum; (e) the term of probation or supervised release imposed by
17 the Court, provided it is within the statutory maximum; and (f) any
18 of the following conditions of probation or supervised release
19 imposed by the Court: the conditions set forth in Second Amended
20 General Order 20-04 of this Court; the drug testing conditions
21 mandated by 18 U.S.C. §§ 3563(a)(5) and 3583(d); and the alcohol and
22 drug use conditions authorized by 18 U.S.C. § 3563(b)(7).

23 19. Defendant also gives up any right to bring a post-
24 conviction collateral attack on the conviction or sentence, including
25 any order of restitution, except a post-conviction collateral attack
26 based on a claim of ineffective assistance of counsel, a claim of
27 newly discovered evidence, or an explicitly retroactive change in the
28 applicable Sentencing Guidelines, sentencing statutes, or statutes of

1 conviction. Defendant understands that this waiver includes, but is
2 not limited to, arguments that the statute to which defendant is
3 pleading guilty is unconstitutional, and any and all claims that the
4 statement of facts provided herein is insufficient to support
5 defendant's plea of guilty.

6 20. The United States agrees that, provided (a) all portions of
7 the sentence are at or below the statutory maximum specified above
8 and (b) the Court imposes a term of imprisonment within or above the
9 range corresponding with an offense level of 21 and the criminal
10 history category calculated by the Court, the United States gives up
11 its right to appeal any portion of the sentence with the exception
12 that the United States reserves the right to appeal the amount of
13 restitution ordered if that amount is less than \$2,376,070.

14 RESULT OF WITHDRAWAL OF GUILTY PLEA

15 21. Defendant agrees that if, after entering a guilty plea
16 pursuant to this agreement, defendant seeks to withdraw and succeeds
17 in withdrawing defendant's guilty plea on any basis other than a
18 claim and finding that entry into this plea agreement was
19 involuntary, then (a) the United States will be relieved of all of
20 its obligations under this agreement; and (b) should the United
21 States choose to pursue any charge that was either dismissed or not
22 filed as a result of this agreement, then (i) any applicable statute
23 of limitations will be tolled between the date of defendant's signing
24 of this agreement and the filing commencing any such action; and
25 (ii) defendant waives and gives up all defenses based on the statute
26 of limitations, any claim of pre-indictment delay, or any speedy
27 trial claim with respect to any such action, except to the extent
28

1 that such defenses existed as of the date of defendant's signing this
2 agreement.

3 RESULT OF VACATUR, REVERSAL OR SET-ASIDE

4 22. Defendant agrees that if the count of conviction is
5 vacated, reversed, or set aside, both the USAO and defendant will be
6 released from all their obligations under this agreement.

7 EFFECTIVE DATE OF AGREEMENT

8 23. This agreement is effective upon signature and execution of
9 all required certifications by defendant, defendant's counsel, and an
10 Assistant United States Attorney.

11 BREACH OF AGREEMENT

12 24. Defendant agrees that if defendant, at any time after the
13 signature of this agreement and execution of all required
14 certifications by defendant, defendant's counsel, and an Assistant
15 United States Attorney, knowingly violates or fails to perform any of
16 defendant's obligations under this agreement ("a breach"), the United
17 States may declare this agreement breached. All of defendant's
18 obligations are material, a single breach of this agreement is
19 sufficient for the United States to declare a breach, and defendant
20 shall not be deemed to have cured a breach without the express
21 agreement of the United States in writing. If the United States
22 declares this agreement breached, and the Court finds such a breach
23 to have occurred, then: (a) if defendant has previously entered a
24 guilty plea pursuant to this agreement, defendant will not be able to
25 withdraw the guilty plea, and (b) the United States will be relieved
26 of all its obligations under this agreement.

27 25. Following the Court's finding of a knowing breach of this
28 agreement by defendant, should the United States choose to pursue any

1 charge that was either dismissed or not filed as a result of this
2 agreement, then:

3 a. Defendant agrees that any applicable statute of
4 limitations is tolled between the date of defendant's signing of this
5 agreement and the filing commencing any such action.

6 b. Defendant waives and gives up all defenses based on
7 the statute of limitations, any claim of pre-indictment delay, or any
8 speedy trial claim with respect to any such action, except to the
9 extent that such defenses existed as of the date of defendant's
10 signing this agreement.

11 c. Defendant agrees that: (i) any statements made by
12 defendant, under oath, at the guilty plea hearing (if such a hearing
13 occurred prior to the breach); (ii) the agreed to factual basis
14 statement in this agreement; and (iii) any evidence derived from such
15 statements, shall be admissible against defendant in any such action
16 against defendant, and defendant waives and gives up any claim under
17 the United States Constitution, any statute, Rule 410 of the Federal
18 Rules of Evidence, Rule 11(f) of the Federal Rules of Criminal
19 Procedure, or any other federal rule, that the statements or any
20 evidence derived from the statements should be suppressed or are
21 inadmissible.

22 COURT AND UNITED STATES PROBATION AND PRETRIAL SERVICES

23 OFFICE NOT PARTIES

24 26. Defendant understands that the Court and the United States
25 Probation and Pretrial Services Office are not parties to this
26 agreement and need not accept any of the United States' sentencing
27 recommendations or the parties' agreements to facts or sentencing
28 factors.

1 27. Defendant understands that both defendant and the United
2 States are free to: (a) supplement the facts by supplying relevant
3 information to the United States Probation and Pretrial Services
4 Office and the Court, (b) correct any and all factual misstatements
5 relating to the Court's Sentencing Guidelines calculations and
6 determination of sentence, and (c) argue on appeal and collateral
7 review that the Court's Sentencing Guidelines calculations and the
8 sentence it chooses to impose are not error, although each party
9 agrees to maintain its view that the calculations in paragraph 16 are
10 consistent with the facts of this case. While this paragraph permits
11 both the United States and defendant to submit full and complete
12 factual information to the United States Probation and Pretrial
13 Services Office and the Court, even if that factual information may
14 be viewed as inconsistent with the facts agreed to in this agreement,
15 this paragraph does not affect defendant's and the United States'
16 obligations not to contest the facts agreed to in this agreement.

17 28. Defendant understands that even if the Court ignores any
18 sentencing recommendation, finds facts or reaches conclusions
19 different from those agreed to, and/or imposes any sentence up to the
20 maximum established by statute, defendant cannot, for that reason,
21 withdraw defendant's guilty plea, and defendant will remain bound to
22 fulfill all defendant's obligations under this agreement. Defendant
23 understands that no one -- not the prosecutor, defendant's attorney,
24 or the Court -- can make a binding prediction or promise regarding
25 the sentence defendant will receive, except that it will be within
26 the statutory maximum.

NO ADDITIONAL AGREEMENTS

29. Defendant understands that, except as set forth herein, there are no promises, understandings, or agreements between the United States and defendant or defendant's attorney, and that no additional promise, understanding, or agreement may be entered into unless in a writing signed by all parties or on the record in court.

PLEA AGREEMENT PART OF THE GUILTY PLEA HEARING

30. The parties agree that this agreement will be considered part of the record of defendant's guilty plea hearing as if the entire agreement had been read into the record of the proceeding.

AGREED AND ACCEPTED

UNITED STATES ATTORNEY'S OFFICE
FOR THE CENTRAL DISTRICT OF
CALIFORNIA

JOSEPH T. MCNALLY
Acting United States Attorney



2/3/2025

MAXWELL COLL
NISHA CHANDRAN
Assistant United States Attorneys

Date

STEFANIE SCHWARTZ
Trial Attorney
Criminal Division, Computer Crime
and Intellectual Property Section

zhang Yicheng

1/30/25

YICHENG ZHANG
Defendant

Date

ERROL STAMBLER
Attorney for Defendant
YICHENG ZHANG

Date

1/30/25

CERTIFICATION OF DEFENDANT

I have read this agreement in its entirety. This agreement has been read to me in Mandarin, the language I understand best. I have had enough time to review and consider this agreement, and I have carefully and thoroughly discussed every part of it with my attorney. I understand the terms of this agreement, and I voluntarily agree to those terms. I have discussed the evidence with my attorney, and my attorney has advised me of my rights, of possible pretrial motions that might be filed, of possible defenses that might be asserted either prior to or at trial, of the sentencing factors set forth in 18 U.S.C. § 3553(a), of relevant Sentencing Guidelines provisions, and of the consequences of entering into this agreement. No promises, inducements, or representations of any kind have been made to me other than those contained in this agreement. No one has threatened or forced me in any way to enter into this agreement. I am satisfied with the representation of my attorney in this matter, and I am pleading guilty because I am guilty of the charge and wish to take advantage of the promises set forth in this agreement, and not for any other reason.

zhang Yicheng
YICHENG ZHANG
Defendant

1/30/25
Date

CERTIFICATION OF INTERPRETER

I, Yanyan Liu am fluent in the written and spoken English and Mandarin languages. I accurately translated this entire agreement from English into Mandarin to defendant YICHENG ZHANG on this date.

Yan
INTERPRETER

1/30/25
Date

CERTIFICATION OF DEFENDANT'S ATTORNEY

I am YICHENG ZHANG's attorney. I have carefully and thoroughly discussed every part of this agreement with my client. Further, I have fully advised my client of his rights, of possible pretrial motions that might be filed, of possible defenses that might be asserted either prior to or at trial, of the sentencing factors set forth in 18 U.S.C. § 3553(a), of relevant Sentencing Guidelines provisions, and of the consequences of entering into this agreement. To my knowledge: no promises, inducements, or representations of any kind have been made to my client other than those contained in this agreement; no one has threatened or forced my client in any way to enter into this agreement; my client's decision to enter into this agreement is an informed and voluntary one; and the factual basis set forth in this agreement is sufficient to support my client's entry of a guilty plea pursuant to this agreement.

Errol Stambler
ERROL STAMBLER
Attorney for Defendant
YICHENG ZHANG

1/30/25
Date